

DLA PIPER US LLP
Robin C. Tarr (RT 8166)
Rachel V. Stevens (RS 0350)
1251 Avenue of the Americas
New York, New York 10020-1104
(212) 335-4500

Attorneys for Defendant CHAD W. KARASAKI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MAY 14 2008
MARSH USA INC. and MARSH & MCLENNAN
COMPANIES INC.,

Plaintiffs,

- against -

CHAD W. KARASAKI,

Defendant.

Civil Action No.: 08 Civ. 4195 (JGK)

NOTICE OF MOTION FOR
ADMISSION *PRO HAC VICE* OF
JEFFREY S. PORTNOY

PLEASE TAKE NOTICE that upon the annexed Declaration of Rachel V. Stevens,

dated May 14, 2008, the annexed Affidavit of Jeffrey S. Portnoy, dated May 9, 2008, and all
attachments thereto, the undersigned attorney for DEFENDANT CHAD W. KARASAKI, will move
this Court on submission before the Honorable John G. Koeltl at the United States District Court for
the Southern District of New York, United States Courthouse, 500 Pearl Street, Room 1030 New York,
New York 10007-1312, for an Order pursuant to Local Civil Rule 1.3(c) of this Court granting Jeffrey
S. Portnoy admission *pro hac vice* to this Court and for such other and further relief as this Court
deems just and proper.

Dated: New York, New York
May 14, 2008

A handwritten signature in black ink, appearing to read 'R. Stevens', is written over a horizontal line.

Rachel V. Stevens (RS 0350)
DLA PIPER US LLP
1251 Avenue of the Americas
New York, NY 10020
(212) 335-4500

Attorneys for Defendant
CHAD W. KARASAKI

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 1251 Avenue of the Americas
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Attorneys for Defendant CHAD W. KARASAKI

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

----- X	
MARSH USA INC. and MARSH & MCLENNAN	:
COMPANIES INC.,	:
	:
Plaintiffs,	:
	:
- against -	:
	:
CHAD W. KARASAKI,	:
	:
Defendant.	:
	:
----- X	

Civil Action No.: 08 Civ. 4195 (JGK)

DECLARATION OF
 RACHEL V. STEVENS IN
 SUPPORT OF MOTION FOR
 ADMISSION *PRO HAC VICE* OF
 JEFFREY S. PORTNOY

I, RACHEL V. STEVENS, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney of the law firm DLA Piper US LLP, counsel for Defendant CHAD W. KARASAKI. My office is located at 1251 Avenue of the Americas, New York, New York, 10020.

2. I am a member in good standing of the Bar of the State of New York and of the United States District Court for the Southern District of New York, and respectfully submit this declaration in support of the motion pursuant to Local Civil Rule 1.3(c) of this Court for the admission *pro hac vice* of Jeffrey S. Portnoy, a member of the law firm of Cades Schutte, LLP, in its office located at 1000 Bishop Street, 12th Floor, Honolulu, Hawaii, 96813.

3. Mr. Portnoy is a member in good standing of the Bar of the state of Hawaii, and is an attorney in good standing of the Bars of The United States Supreme Court, Ninth Circuit Court of Appeals and the United States District Court for the District of Hawaii. Having worked with Mr. Portnoy, I believe him to be of high moral character and extremely competent in the practice of law.

4. The Declaration of Mr. Portnoy affirming his good standing for the bar of Hawaii to which he is admitted is filed herewith. His Certificate of Good Standing for the bar of Hawaii is attached to his accompanying declaration.

5 I further affirm that I am fully familiar with the facts of this case and will assist Mr. Portnoy in the preparation of this case.

Dated: New York, New York
May 14, 2008



RACHEL V. STEVENS

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----		X
MARSH USA INC. and MARSH &	:	
MCLENNAN COMPANIES, INC.,	:	
	:	
Plaintiffs,	:	Civil Action No.: 08 Civ. 4195 (JGK)
	:	
v.	:	AFFIDAVIT OF JEFFERY S. PORTNOY
	:	IN SUPPORT OF APPLICATION FOR
CHAD W. KARASAKI,	:	ADMISSION PRO HAC VICE
	:	
Defendant.	:	
-----		X

CITY AND COUNTY OF HONOLULU)
):ss:
STATE OF HAWAII)

JEFFERY S. PORTNOY being duly sworn, says:

1. I am a member of Cades Schutte, LLP, counsel for defendant Chad Karasaki (“Karasaki”) in this matter. My office is located at 1000 Bishop Street, 12th Floor, Honolulu, HI 96813. I submit this affidavit in support of Defendant’s motion for my admission pro hac vice in this action.

2. I am a citizen of the United States and a resident of the State of Hawaii. I have been a member in good standing of the Bar of the State of Hawaii since 1972. A true and correct copy of my certificate of good standing for the State Bar of Hawaii is attached as Exhibit A.

3. I am also a member in good standing of the Bars of the United States Supreme Court, the Ninth Circuit Court of Appeals and the United States District Court for the District of Hawaii. I am in good standing and eligible to practice in these courts. I am not currently suspended or disbarred in any courts.

4. There is good cause to grant this application. The Defendant wishes me to be counsel on this matter due to my full familiarity with the facts and legal issues of this particular case.

5. I have never been held in contempt of Court, nor have I ever been censured, suspended or disbarred by any court.

6. I have read and am familiar with:

- (a) the provisions of the Judicial Code which pertain to the jurisdiction of, and practice in, the United States District Courts;
- (b) the Federal Rules of Civil Procedure for the district courts;
- (c) the Federal Rules of Evidence for the United States Courts and Magistrates; and
- (d) the Code of Professional Responsibility of the American Bar Association, and will faithfully adhere thereto.

7. As a part of my admission pro hac vice, I agree:

- (a) to be bound by all procedural rules and disciplinary rules governing the practice of law before this Court;
- (b) to advise the Court if I cease to be a member in good standing of the Bar of the State of Hawaii;
- (c) to continue to work with New York counsel throughout the course of this case; and
- (d) to follow New York customs of practice.

WHEREFORE, I respectfully request that I be admitted to practice before this Court pro
hac vice on behalf of the Defendant pursuant to the proposed order annexed hereto.

Jeffery S. Portnoy, Esq.

Sworn to and subscribed before me this
9th day of May, 2008



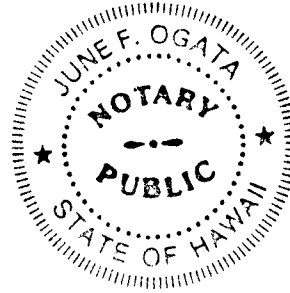
Notary Public

June F. Ogata

Notary Public, State of Hawaii

My commission expires:

AUG 29 2010



IN THE SUPREME COURT OF HAWAII,

In the Matter of

JEFFREY S. PORTNOY

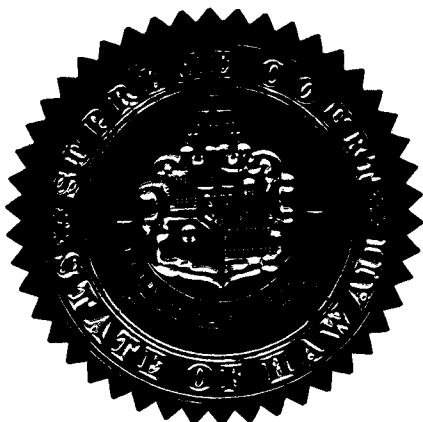
.....
Attorney at Law.

.....

CERTIFICATE OF QUALIFICATION

I, Evelyn M. Rimando, clerk of the Supreme Court of the State of Hawai'i, do hereby certify that JEFFREY S. PORTNOY is an attorney and was admitted to practice as an attorney, counselor and solicitor in all the courts of the State of Hawai'i on September 15, 1972 ; is at present an active member of the bar of Hawai'i, in good standing, and has never been suspended for misconduct.

DATED: Honolulu, Hawai'i, May 7, 2008.




.....
Clerk, Supreme Court of Hawai'i.

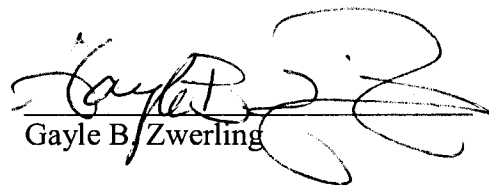
AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

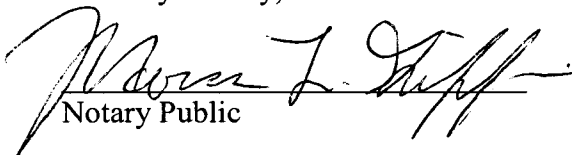
GAYLE B. ZWERLING, being duly sworn, deposes and says: I am over the age of 18 years and not a party to this action. On the 14th day of May 2008, I caused a true copy of the attached NOTICE OF MOTION FOR ADMISSION *PRO HAC VICE* OF JEFFREY S. PORTNOY, DECLARATION OF RACHEL V. STEVENS IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE* OF JEFFREY S. PORTNOY, AFFIDAVIT OF JEFFREY S. PORTNOY IN SUPPORT OF APPLICATION FOR ADMISSION *PRO HAC VICE* and PROPOSED ORDER, to be served by U.S. Mail on counsel at the following address:

Gary D. Friedman, Esq.
David R. Fernig, Esq.
Weil Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153

the address designated by them for that purpose. Service by mail was completed by depositing true copies of the aforementioned documents in a properly addressed and postage paid wrapper for First Class delivery into the custody of the United States Postal Service.


Gayle B. Zwerling

Sworn to before me this
14th day of May, 2008.


Notary Public

MARCUS L. GRIFFIN
Notary Public, State Of New York
No. 01GR5062272
Qualified in New York County
Commission Expires June 24, 2010

DLA PIPER US LLP
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Attorneys for Defendant CHAD W. KARASAKI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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COMPANIES INC.,

Plaintiffs,

- against -

CHAD W. KARASAKI,

Defendant.
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Civil Action No.: 08 Civ. 4195 (JGK)

PROPOSED *PRO HAC VICE* ORDER

The Court, having reviewed the Declaration of Rachel V. Stevens, sworn to May 14, 2008, the Affidavit of Jeffrey S. Portnoy, sworn to May 9, 2008, and the attached exhibits and the accompanying Notice of Motion for Admission *Pro Hac Vice* of Jeffrey S. Portnoy, it is hereby

ORDERED, that the admission of Jeffrey S. Portnoy *Pro Hac Vice* is granted.

U. S. D. J.

Dated: _____